



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

August 19, 2002

Dirk Kempthorne, Governor
C. Stephen Allred, Director

Ms. Kathleen Hain, Team Leader
Environmental Restoration Program
U.S. Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

RE: DEQ Review of the Draft Re-evaluation of the Final Remediation Goals
for Mercury at the CFA-04 (CFA-674 Pond)

Dear Ms. Hain:

The Idaho Department of Environmental Quality (DEQ) has completed its review of the above-referenced document, which discusses the impact of new mercury toxicity data on the selected remedy for CFA-04.

An evaluation of the final remediation goal (FRG) for the CFA-04 Pond clean-up of mercury contaminated soils was initially proposed by DOE and discussed with the agencies. This new data indicates that mercury toxicity in soils is relative to the amount of methylation of inorganic mercury that has occurred. Consequently, the fate and transport modeling, using this new information, proposes that a cleanup level of 8.4 mg/kg is acceptable rather than the current level of 0.50 mg/kg, required by the WAG 4 Record of Decision (ROD). This revised cleanup standard will result in substantially less contaminated soil that will be subject to remedial action than the 6,338 m³ currently estimated for this site, while still maintaining the same level of protectiveness of the selected remedy.

Prior to changing the cleanup level, the agencies have agreed to additional sampling of the pond to verify the assumptions contained in this report. Upon review of this data, and determination that the assumptions are valid, DEQ will notify DOE that the new cleanup level is acceptable. At that time, it will be necessary to proceed with an Explanation of Significant Difference to the ROD as necessary to provide the public an opportunity to raise any concerns regarding this change.

If you have any questions regarding this review, please contact me at (208) 373-0285.

Sincerely,

A handwritten signature in black ink, appearing to read "Dean Nygard".

Dean Nygard
Site Remediation Program Manager
Waste Management and Remediation Division

DNACC:ls [2002/C&M/Mercury re-evaluation 2 [accept chgs]]

Enclosure

cc: Carol Hathaway, DOE-ID
Kathy Ivy, EPA, Region 10
Daryl Koch, DEQ-WM&RD
Clyde Cody, DEQ-TSD
CERCLA Source File
COF